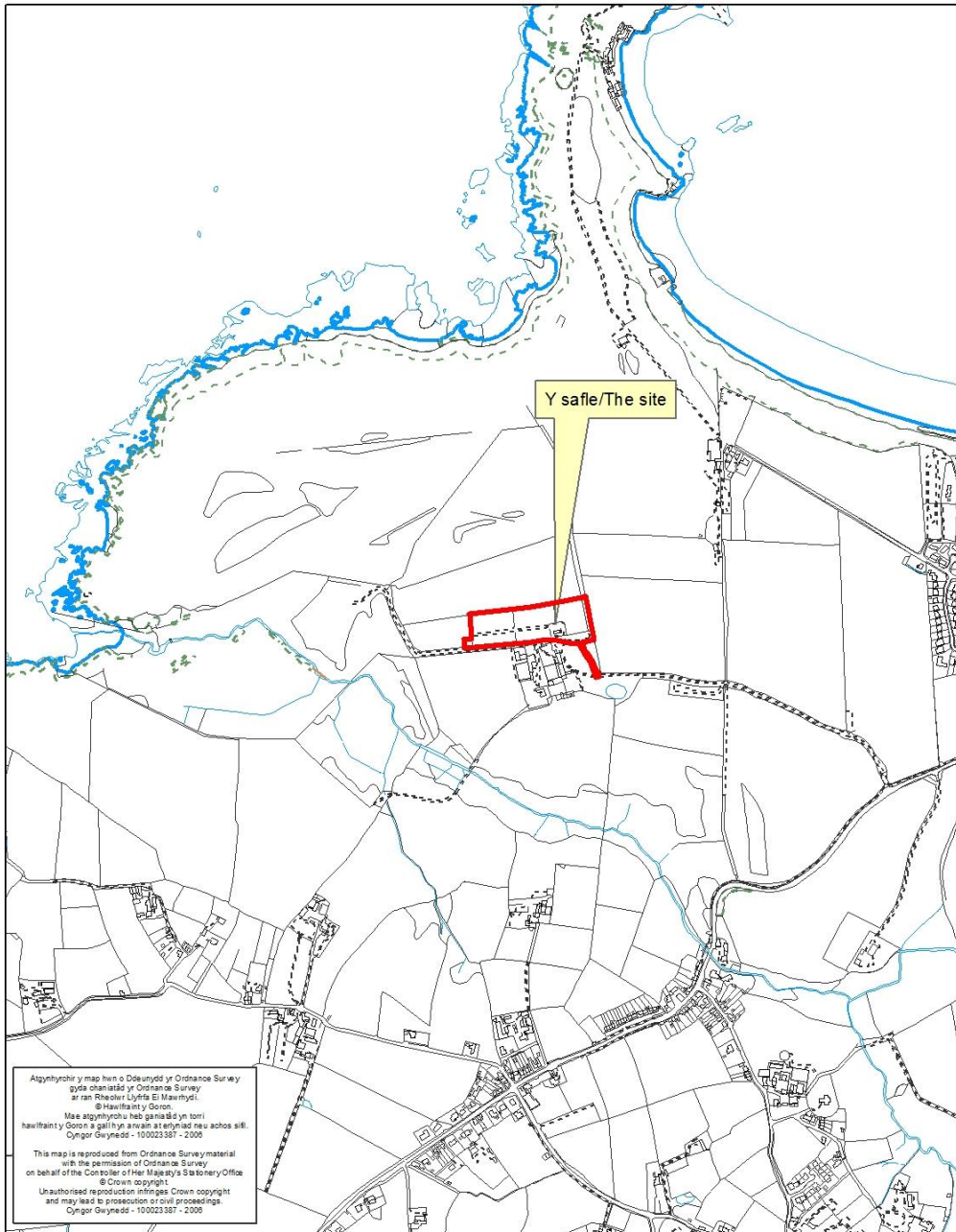


Number: 6.2



Rhif y Cais / Application Number : C15/1358/42/LL

Cynllun lleoliad ar gyfer adnabod y safle yn unig. Dim i raddfa.
Location Plan for identification purposes only. Not to scale.



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Application Number: C15/1358/42/LL
Date Registered: 29/01/2016
Application Type: Full - Planning
Community: Nefyn
Ward: Morfa Nefyn

Proposal: IMPROVEMENTS TO TOURING CARAVAN SITE WHICH INCLUDE INCREASING NUMBERS FROM 36 TO 60 UNITS, FORMATION OF 61 HARD-STANDINGS, RE-SITING OF PLAYING FIELD AND CREATION OF NEW PLAY AREA, SERVICE CONNECTIONS, DEMOLITION OF AMENITY BLOCK AND ERECT NEW AMENITY BUILDING TO INCLUDE SHOP, FORMATION OF INTERNAL ROADWAY AND PARKING AREA, SITING A MANAGER'S CARAVAN AND UNDERTAKING LANDSCAPING WORKS.

Location: FFERM PORTHDINLLAEN, MORFA NEFYN, PWLLHELI, LL536BE

Summary of the Recommendation:

TO REFUSE

1. Description:

1.1 This is an application to undertake improvements to an existing touring caravan site in Fferm Porthdinllaen, Morfa Nefyn. These improvements include:

- Increasing the number of touring units from 36 to 60
- Locating 1 touring caravan for the manager
- Creating 61 hard-standings
- Re-siting of playing field and creating a new play area
- Installing connections to utilities and private treatment tank
- Demolishing the existing toilet block and constructing a new building to include toilets, showers, shop and reception, office, launderette and open kitchen.
- Creating an internal roadway and parking area
- Landscaping work.

1.2 This is a countryside coastal site on the outskirts of Morfa Nefyn. The site is served by a second class county road, namely the B4417, and a private farm track. No other properties that may be affected are close to the site. The caravan field is relatively level and is located adjacent to existing farm buildings and within an Area of Outstanding Natural Beauty designation and near a Heritage Coast. A public footpath runs parallel to the eastern boundary of the site and further to the north and they link with the nearby coastal path. The Llŷn Fens Special Area of Conservation and the Aber Geirch Site of Special Scientific Interest are located to the west of the site.

1.3 The application is submitted to the Committee as it involves a development of five or more caravans. A Design and Access Statement, Application Support Statement and a Community and Linguistic Statement have been submitted with the application.

2. Relevant Policies:

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that planning decisions should be in accordance with the Development Plan, unless material considerations indicate otherwise. Planning considerations include National Planning Policy and the Unitary Development Plan.

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2.2 Gwynedd Unitary Development Plan 2009:

POLICY A2 – PROTECT THE SOCIAL, LINGUISTIC AND CULTURAL FABRIC OF COMMUNITIES - Safeguard the social, linguistic or cultural cohesion of communities against significant harm due to the size, scale or location of proposals.

POLICY B8 - THE LLŶN AND ANGLESEY AREAS OF OUTSTANDING NATURAL BEAUTY (AONB) - Safeguard, maintain and enhance the character of the Areas of Outstanding Natural Beauty by ensuring that proposals conform to a number of criteria aimed at protecting the recognised features of the site in accordance with the statutory requirements of the Countryside and Rights of Way Act 2000.

POLICY B9 – THE HERITAGE COAST - Refuse proposals for any building or structure on the heritage coast unless they can conform to a series of criteria aimed at avoiding significant damage to recognised features.

POLICY B15 – PROTECTION OF NATURE CONSERVATION SITES OF INTERNATIONAL SIGNIFICANCE - Refuse proposals which are likely to cause significant harm to the integrity of nature conservation sites of international significance unless they conform to a series of criteria aimed at managing, enhancing and safeguarding the recognised features of such sites.

POLICY B16 – PROTECTING NATIONALLY IMPORTANT NATURE CONSERVATION SITES - Refuse proposals which are likely to cause significant harm to nature conservation sites of national significance unless they conform to a series of criteria aimed at protecting, enhancing and managing the recognised features of the sites.

POLICY B22 – BUILDING DESIGN - Promote good building design by ensuring that proposals conform to a series of criteria aimed at protecting the recognised features and character of the local landscape and environment.

POLICY B25 – BUILDING MATERIALS - Safeguard the visual character by ensuring that the building materials are of a high standard and in keeping with the character and appearance of the local area.

POLICY B27 – LANDSCAPING SCHEMES - Ensure that permitted proposals incorporate high quality soft/hard landscaping which is appropriate to the site and which takes into consideration a series of factors aimed at avoiding damage to recognised features.

Policy CH22 – CYCLING NETWORK, PATHS AND RIGHTS OF WAY - All parts of the cycling network, footpaths and rights of way will be protected by encouraging proposals to incorporate them satisfactorily within the development and by refusing proposals which will prohibit plans to extend the cycling network, footpaths or rights of way. Should this not be possible, appropriate provision will have to be made to divert the route or to provide a new and acceptable route.

POLICY CH33 – SAFETY ON ROADS AND STREETS - Development proposals will be approved provided they can conform to specific criteria relating to the vehicular entrance, the standard of the existing roads network and traffic calming measures.

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POLICY CH36 – PRIVATE CAR PARKING FACILITIES - Proposals for new development, extension of existing development or change of use will be refused unless off-street parking is provided in accordance with the Council's current parking guidelines and having given due consideration to the accessibility of public transport, the possibility of walking or cycling from the site and the distance from the site to a public car park.

POLICY D20 - SITES FOR TOURING CARAVANS, CAMPING AND TOURING UNITS, EXTENSIONS, ADDITIONAL PITCHES, RELOCATION AND EXCHANGE - Proposals for increasing the number of pitches, extensions to sites, relocation or exchange of sites will be approved if the proposal includes a plan to ensure environmental and visual improvements, and meets other criteria regarding the impact of the development on the local area.

Supplementary Planning Guidance, Gwynedd Council: Holiday Accommodation (July 2011)

Supplementary Planning Guidance, Gwynedd Council: Planning and the Welsh Language (November 2009)

2.3 National Policies:

Planning Policy Wales (2016)
 Technical Advice Note 12 – Design
 Technical Advice Note 13 – Tourism
 Technical Advice Note 18 – Transport
 Technical Advice Note 20 – Planning and the Welsh Language

3. Relevant Planning History:

C10D/0385/42/LL Conversion of agricultural building into a hostel along with parking provision: Approved 8 March 2011

C10D/0111/42/LL Increase number of touring caravans from 20 to 36 within the existing site along with engineering works to create track and hard-standings: Approved 7 March 2012

C04D/0613/42/LL Use agricultural land to store 30 touring caravans, 30 boats and erect a security fence (Amended plan): Approved 11 January 2005

C04D/0196/42/LL Storage of 60 touring caravans: Approved 3 June 2004

C03D/0198/42/LL Site for 20 touring units: Approved 14 February 2005 (application site)

2/22/349A Site for 10 touring caravans on field number 441: Approved 31 October 1986 (on another field on the farm)

4. Consultations:

Community/Town Council: No objection.

Transportation Unit: I refer to the above application, and confirm that I have no objection to the proposal. Access to the site with the nearby class B road has already been upgraded as part of a previous application and it is assumed that the level of additional traffic expected as a result of this proposed development

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could be dealt with. It is also assumed that the site could be found conveniently directly from the highway through Morfa Nefyn and therefore, the proposal is unlikely to have a detrimental impact on the local roads network.

Public Protection Unit: This application is welcomed from the perspective of licence conditions under the Caravan Site and Control of Development Act 1960.

Our records include a correspondence from this department to the applicant noting that an insufficient number of facilities have been prepared for 36 touring caravans in the past. This application proposes to increase the number of caravans from 36 to 61 touring caravans including a touring caravan for the site manager that also needs to be licensed for living use during the site's opening season. Children's play equipment will have to be provided in accordance with EN1176 Playground Equipment Standard.

AONB Unit: The site in question is in the AONB and by the Heritage Coast and some public footpaths and the Coastal Path are nearby. The development keeps within the existing boundaries but it would involve a more intense pattern of caravans. The number of ancillary developments would increase the visual impact of the caravan site: - creation of 61 hard-standings, new toilet block / larger facilities and parking area.

Further landscaping work which is part of the development would be a benefit to the environment but the cumulative impact of the different aspects of the application would increase the impact of the site on the landscape and the AONB.

Natural Resources Wales: Further explanation required from the agent regarding the current private drainage arrangements that would serve the proposal.

Welsh Water: No objection.

Fire Service: No observations on the application in relation to access to fire equipment and water supply.

Public Consultation: A notice was placed near the site entrance. There are no close neighbours to inform. One item of correspondence in support of the application was received.

5. Assessment of the relevant planning considerations:

The principle of the development and visual amenities

5.1 Policy D20 of the GUDP approves proposals to increase the number of pitches on existing touring caravan sites by means of an extension provided the proposal forms part of a plan that will secure environmental and visual improvements in terms of the location, layout, design and appearance of the site, and its position in the surrounding landscape. Furthermore, it is a requirement that the proposed development will not exceed the reasonable capacity of the immediate locality to accommodate such a

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development, taking into account the cumulative impact of existing touring caravan sites.

- 5.2 The proposal in question involves adding 24 new touring caravans within the existing boundaries of the caravan site, which currently has planning permission for 36 touring caravans. It is also intended to have one additional touring caravan located adjacent to the amenity building during the holiday season as a full-time unit for the site manager, which would give a total of 61 units on the site. Among the proposed improvements are a proposal to provide 61 hard-standings and provide service utility for every pitch to include electricity, water and foul water and installing a new private treatment tank on the site. It is proposed to construct a new amenity building, provide an internal roadway, undertake landscaping work and also re-locate the play area.
- 5.3 Although an increase of 25 units is a substantial increase in numbers, it would not involve extending the surface area of the site and is merely filling in gaps within the existing site and formalising the layout. The fact that the proposal would not involve extending the surface area of the site is especially welcomed due to the sensitivity of the landscape, which is within an Area of Outstanding Natural Beauty designation and near a Heritage Coast. The site is not prominent from Morfa Nefyn but is visible from parts along nearby public footpaths and from distances such as from the village of Edern. Concern was expressed by the AONB Unit that a more intense pattern of caravans and associated works would be likely to increase the visual impact of the caravan site within the landscape. Whilst more numbers would be likely to highlight the site from distances, consideration must be given to whether the change in density is that much of a visual change to what is currently experienced to cause significant harm to the AONB and the Heritage Coast.
- 5.4 As part of the improvement, it is requested that the existing amenity building is demolished and a new larger block is constructed measuring approximately 184m² to include a shop/reception, office, toilets for men / women, launderette and communal kitchen. An amended plan was received for this element as officers expressed concern regarding the scale, height and design of the proposed building. Although minor changes have been undertaken to its height and internal layout, officers' concerns remain. The observations of the Caravans Officer note that an insufficient number of facilities have currently been prepared for 36 touring caravans therefore, improvements to the toilet and shower provision can be justified. However, it is questioned whether there is a real need for ancillary rooms of the size indicated. There is no objection to the principle of erecting a new building as part of upgrading work, but it is considered that the scale and size of the proposed building is excessive. It is believed that the design appears to be domestic and the hip roof is an alien feature on this site and uncommon in the vicinity and there is concern that approving a building of this scale would create a precedent for other sites. We have attempted to negotiate with the agent to submit a more suitable design that would respect and reflect the appearance and finish of adjacent agricultural buildings rather than giving the impression of a domestic building. Based on the scale and design of what is proposed, it is considered that the building would look out of place on the site and that it would have a detrimental impact on the character of the landscape and therefore, be contrary to the requirements of design policy B22 of the GUDP. The building, based specifically on its scale, design and form, would not contribute either to the site's environmental and visual improvements and its setting in the surrounding landscape.
- 5.5 There is no substantial concern regarding the element of installing a private treatment tank or re-locating the playing area in the camping site, as these elements are relatively small and offer an improvement to the visitors' services and facilities. It is

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also considered that installing hard-standings, a service road and creating an overflow car park by the entrance would be an acceptable upgrade. However, bearing in mind that they would be permanent features, it is believed that a bod pave type of finish rather than slate waste finish would be more suitable as hard-standings in order to avoid extensive hard surfaces in this sensitive location.

- 5.6 There are *cloddiau* surrounding the boundary of the caravan site, with hedgerows / gorse of varied standard, height and density here and there on those *cloddiau*. A landscaping plan was submitted as part of the application noting that there was an intention to reinforce boundaries and to plant more hedgerows and trees to get a bit of height. There is also an intention to plant more internal hedgerows within the field to divide the field into different sections. The current landscaping situation is not ideal and in order to justify the increase in numbers the applicant would be expected to invest heavily and commit to planting work on site to soften the impact of the density of use on the landscape, which is within the AONB. We would wish to see high hedgerows being maintained on the boundaries in order to screen their impact. The proposal to plant is supported which would certainly improve the appearance of the site and its setting in the landscape and it is considered that the landscaping plan is acceptable to satisfy the requirements of policy CH27 of the GUDP. Whilst accepting that the additional landscaping in such a coastal site would take time to establish, it is considered that landscaping could soften the impact of units on the landscape of the AONB and Heritage Coast in the long-term and satisfy the requirements of policies B8 and B9 of the GUDP.
- 5.7 The site's current operating condition restricts use to between 1 April to 31 October in any one year. Nevertheless, Council policies now permit the operation of touring sites from 1 March onwards until the end of October in the same year. Although no formal request was made to change the period, it is deemed reasonable to change it in order to be consistent with other sites in the vicinity and for enforcement purposes.
- 5.8 As access to the site is on the outskirts of the village of Morfa Nefyn from a class 2 county road, it is considered that the local roads network is suitable enough to cope with the increase. There is no other touring site nearby in the same visual context as this site therefore, there is no concern regarding cumulative impact in this case.
- 5.9 The aim of policy D20 is to promote improving the quality of touring caravan and camping sites and reducing their visual impact on the landscape. By assessing the proposal against the policy, it is believed that elements of the upgrade are acceptable in principle; however, it is not considered that the element of the amenity building improves the appearance of the site and its setting in the surrounding landscape and therefore, it does not fully comply with the requirements of policy D20 or design policy B22 of the GUDP. If these matters would have been acceptable, it is considered that it would be possible to manage materials through a condition and therefore that the proposal could have been in accordance with policy B22 of the GUDP.
- 5.10 It is stated in the Supplementary Planning Guidance: Holiday Accommodation, Gwynedd Council that the aim of policy D20 is to encourage developments that will lead to visual improvements and upgrading existing sites, and not promote an increase in the size of a business in terms of the number and size of units on the site. It elaborates that applicants will need to be able to demonstrate, to the satisfaction of the Local Planning Authority, that the proposal is essentially a scheme to make visual, environmental, ecological or economic improvements. The Application Support Statement elaborates that the increase in numbers would contribute substantially to the local economy. Despite the investment and economic advantages,

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the proposal before the committee does not satisfy the requirements of the policy regarding safeguarding the visual amenities of the area which is one of the reasons why visitors visit the area in the first place.

- 5.11 The site is nearby the Llŷn Fens Special Area of Conservation and the Aber Geirch Site of Special Scientific Interest. Natural Resources Wales have raised questions regarding the suitability of a cesspit indicated on the original plans as the drainage method. In the meantime, confirmation was received from the agent that it is intended to install a private treatment system near the site entrance. We have re-consulted with NRW regarding the matter and we await their observations to see whether the proposal is likely to have an impact on the conservation designations above in order to meet the requirements of policies B15 and B16 of the GUDP.

Transport and access matters

- 5.12 Access to the site is from the class 2 county road of the B4417 and private farm track measuring 700m leading from the entrance to the caravan site. The site entrance has recently been upgraded and substantial work has been undertaken to widen the road and install a pavement to the direction of Edern therefore, there is good visibility in both directions. The Transportation Unit are satisfied with the proposal and consider that the local roads network could deal with the additional traffic level and is unlikely to have a detrimental impact on the network. There would be one parking space for every caravan pitch and there is an intention to provide a new overflow parking area near the caravan site entrance. Based on the observations of the Transportation Unit, it is considered that the proposal complies with the requirements of policies CH33 (road safety) and CH36 (parking) of the GUDP.

- 5.13 Public footpaths abut the site but the proposal would not affect the courses of those footpaths and therefore, the proposal is not contrary to policy CH22 of the GUDP.

5.14 **Linguistic Matters**

Policy A2 of the GUDP states that proposals that would cause significant harm to the social, linguistic or cultural cohesion of communities, due to their size, scale or location, will be refused. As the proposal involves a tourism development which will create ten or more holiday units there is a requirement for a Language and Community Statement to be prepared in order to comply with the Supplementary Planning Guidance: Planning and the Welsh Language. A Language and Community Statement was received as part of the application and the Joint Planning Policy Unit was consulted. Their response was received which notes that it is not believed that the nature or scale of the development are likely to have an adverse impact on the Welsh language. The situation of the Welsh language is relatively strong in the Morfa Nefyn ward and the area attracts a high proportion of visitors who are non-Welsh speakers every year. The patrons of the caravan site cannot be controlled on linguistic grounds. Occupancy in touring caravans is of a temporary nature and the caravans will only be used for holiday purposes. Since the proposal is solely for touring caravan pitches and not permanent pitches, it is unlikely that the development will have an impact on inward migration to the area. It is suggested that mitigating measures are taken to protect and promote the Welsh language, such as Welsh signage and offering opportunities to learn about the Welsh language. On the basis of the response, it is considered that the proposal is acceptable in the context of policy A2 of the GUDP.

6. Conclusions:

- 6.1 Although some aspects of the proposal are acceptable as a means to upgrade the site, the Council is not satisfied that the proposal in its entirety, especially the amenity building element, fully meets the principle of developing touring sites. Officers have

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attempted to negotiate to obtain a more suitable building for its location and its vicinity but the change proposed was deemed insufficient to overcome concerns. There is a concern that permitting an amenity building of this scale would create a precedent for similar sites on other touring sites in the County. Whilst it is noted that there are no concerns based on road safety or that a harmful impact on the Welsh language is likely, the main principles of policy D20 and SPG: Holiday Accommodation are being met. Officers have not been convinced that the plan in its entirety will lead to environmental and visual improvements to improve the appearance of the site in the landscape as it is not considered that the design of the new amenity building proposed respects the site and its vicinity in terms of its scale, size and form that it would have an unacceptable detrimental impact on prominent vistas and on the form and character of the landscape which is contrary to Policy B22 and D20 of the GUDP.

7. Recommendation:

7.1 To refuse:

The amenity building which is the subject of this application would not respect the site and its vicinity in terms of its scale, form and design and therefore, it would look out of place and have an impact on the character of the landscape which is contrary to design policy B22 of the Gwynedd Unitary Development Plan. The building would not contribute either to environmental and visual improvements, specifically on the grounds of its scale, design and appearance on the site and its setting in the landscape and is therefore contrary to policy D20 of the GUDP and Supplementary Planning Guidance: Holiday Accommodation, Gwynedd Council.